

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
LUFKIN DIVISION**

**DEBRA MORRIS, INDIVIDUALLY,  
AND AS REPRESENTATIVE OF  
THE ESTATE OF KENNETH W.  
MORRIS, ASHLEY MORRIS,  
AMANDA MORRIS WRIGHT,  
JIMMY WILLIAMS, REBECCA  
WILLIAMS, ORLANDO ORDAZ,  
AND ROY McCOLLOUGH,**

**Plaintiff,**

**vs.**

**AIRCON CORPORATION,  
GRECON, INC., MID-SOUTH  
ENGINEERING COMPANY, and  
GLOBAL ASSET PROTECTION  
SERVICES LLC**

**Defendants.**

**CIVIL ACTION FILE NO. 9:16-cv-  
00035-RC**

**AFFIDAVIT OF MICHAEL E. CLARK**

STATE OF TEXAS

HARRIS COUNTY

Before me, the undersigned notary, on this date personally appeared Michael E. Clark, the Affiant, a person whose identity is known to me. After I administered an oath to Affiant, Affiant testified:

1. My name is Michael E. Clark.
2. I am counsel of record for Defendant, Global Asset Protection Services LLC ("GAPS"). I am over 18 years of age, of sound mind, and capable of making this affidavit. The facts stated in this affidavit are within my personal knowledge and are true and correct, and I could testify to them competently if called upon to do so.

3. Attached as **Exhibit A-1** is true and correct copy of the April 17, 2017 expert report of Jeff Harrington.

4. Attached as **Exhibit A-2** is true and correct copy of the March 16, 2017 expert report of Frank E. Hagan.

5. Attached as **Exhibit A-3** is true and correct copy of the April 27, 2014 statement of Jesus Villanueva, Jr. as produced in *Ralph Figgs v. Georgia-Pacific LLC et. al*, Cause No. 2016-26100, pending in the 129<sup>th</sup> District Court in Harris County, Texas and reproduced in this matter.

6. Attached as **Exhibit A-4** is true and correct copy of the April 27, 2014 statement of Jesus Reyes, as produced in *Ralph Figgs v. Georgia-Pacific LLC et. al*, Cause No. 2016-26100, pending in the 129<sup>th</sup> District Court in Harris County, Texas and reproduced in this matter.

7. Attached as **Exhibit A-5** is true and correct copy of the April 27, 2014 statement of Jeromy Heath Nelson, as produced in *Ralph Figgs v. Georgia-Pacific LLC et. al*, Cause No. 2016-26100, pending in the 129<sup>th</sup> District Court in Harris County, Texas and reproduced in this matter.

8. Attached as **Exhibit A-6** is true and correct copy of the April 27, 2014 U.S. Department of Labor Occupational Safety and Health Administration Inspection Number 974475, as produced in *Ralph Figgs v. Georgia-Pacific LLC et. al*, Cause No. 2016-26100, pending in the 129<sup>th</sup> District Court in Harris County, Texas and reproduced in this matter.

9. Attached as **Exhibit A-7** is true and correct copy of the Georgia Pacific Emergency Response Manual Grecon Dust System Corrigan, Texas, as produced in *Ralph*

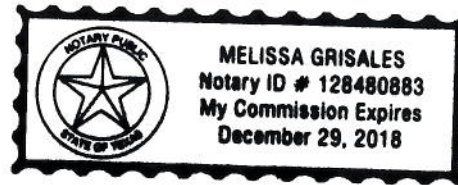
*Figgs v. Georgia-Pacific LLC et. al*, Cause No. 2016-26100, pending in the 129<sup>th</sup> District Court in Harris County, Texas and reproduced in this matter.

Further Affiant Sayeth Not.



Michael E. Clark

Sworn to and subscribed before me  
by Melissa Grisales on this 2<sup>nd</sup> day of  
April, 2017

  
Notary Public

Notary Public in and for the State of Texas

My commission expires: 12.29.18